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June 4, 2013

Hon. Judge Kiyo A. Matsumoto
United States district Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Kramer v. Mahia

Case No. 13-cv-03079-KAM

Dear Judge Matsumoto,

I am requesting this Honorable Court to grant Appellant a fifty day extension of time to file Appellant's brief for multiple reasons. First, due to an ongoing personal issue, I may have to leave the country next month and go to India. I am a solo practitioner and the issues raised in the appeal are very critical and sensitive and require extensive work and research in drafting the argument. I do not want my absence to prejudice my client (collaterally impacted) and jeopardize the quality of work that is required for this brief.

Owing to aforesaid reason, I would request this Honorable Court to set a new filing schedule. I propose Appellant's brief to be submitted by July 15, 2013; Appellee's brief shall be served and filed within 14 days after, which is July 29, 2013 and Appellant's reply brief to be filed and served within 14 days which is August 12, 2013.

Sincerely,

/s/ Karamvir Dahiya

Karamvir Dahiya, Esq.
Attorney for Appellant

CC: Avrum Rosen
Via email and ecf filing
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